



April 20, 2017

Office of Atmospheric Programs
Stratospheric Protection Division
Stratospheric Program Implementation Branch
United States Environmental Protection Agency

Dear Office of Atmospheric Programs,

This letter serves as a petition from Tradewater, LLC to import dichlorodifluoromethane (CFC R-12) from Ghana to the United States. The purpose of this project is to destroy R-12 under protocols established by the Verified Carbon Standard. The project will result in verified carbon offset credits. This request is additional to the petition granted by U.S. EPA in its letter to Tradewater dated February 6th, 2017.

Below are answers to the questions in the petition template provided to us by your office in November 12016.

1. What is the name and quantity of the used controlled substance to be imported?

Tradewater seeks to import approximately 16,000 kg (35,273 pounds) of R-12, contained in 15, 30 and 50 pound cylinders. The R-12 is referred to in this document as the R-12 Material.

2. What are the name and address of the importer, the importer ID number, the contact person, and the phone and fax numbers?

The R-12 Material will be imported by Tradewater, an environmental project development firm. Tradewater is located at 415 N. Aberdeen St, Chicago, Illinois, 60642. The contact person for this R-12 Material is Timothy H. Brown. His phone number is 312-273-5122. His email is tbrown@tradewater.us. There is no fax number.

Tradewater's importer ID number, the same as its Federal EIN, is (b)(4).

3. What is the name and address, contact person, phone number and fax number of all previous source facilities from which the used controlled substance was recovered?

The R-12 Material that will be imported consists of unused cylinders obtained by City Waste Recycling Limited from retail stores and aggregated at the City Waste Recycling facility in Pokuase, Ghana. The contact person is Jürgen Meinel. His telephone number is (b)(4), and his fax number is +233 36 2027253.

4. Please provide a detailed description of the previous use of the controlled substance at each source facility and a best estimate of when the specific controlled substance was put in to the

equipment at each source facility, and, when possible, documents indicating the date the material was put into the equipment.

The R-12 Material is unused and thus has not been put into equipment.

5. Please provide a list of the name, make and model number of the equipment from which the material was recovered at each source facility.

Not applicable.

6. What is the name, address, contact person, phone number and fax number of the exporter and of all persons to whom the material was transferred or sold after it was recovered from the source facility?

City Waste Recycling, in conjunction with the Ghanaian government, will serve to export the R-12 Material. It is anticipated that the R-12 Material will be shipped directly from City Waste Recycling to the United States.

7. Please identify the U.S. port of entry for the import, the expected date of shipment and the vessel transporting the chemical. If at the time of submitting a petition the importer does not know the U.S. port of entry, the expected date of shipment and the vessel transporting the chemical, and the importer receives a non-objection notice for the individual shipment in the petition, the importer is required to notify the Administrator of this information prior to the actual U.S. Customs entry of the individual shipment.

Tradewater has not yet determined the port of entry for the import. Tradewater will notify the Administrator of this information prior to the actual U.S. Customs entry of the individual shipment.

8. Please provide a description of the intended use of the controlled substance, and, when possible, the name, address, contact person, phone number and fax number of the ultimate Purchaser/Destruction Facility in the United States.

Tradewater is a carbon offset project developer and it is importing the R-12 Material for destruction to generate voluntary carbon offset credits under the Verified Carbon Standard's Approved VCS Methodology VM0016, Version 1.0, Recovery and Destruction of Ozone-Depleting Substances (ODS) from Products.

(b) (4)



The appropriate contact address is Tradewater, 415 N. Aberdeen St, Chicago, Illinois, 60642. The contact person for this R-12 Material is Timothy H. Brown. His phone number is 312-273-5122. His email is tbrown@tradewater.us. There is no fax number.

- 9. Please provide the name, address, contact person phone number and fax number of the U.S. reclamation/destruction facility.**

(b) (4)

The contact person is Timothy H. Brown. His phone number is 312-273-5122. His email is tbrown@tradewater.us. There is no fax number.

- 10. Please provide the name and contact information, to include address, phone and fax number for a representative of the source facility that recovered the controlled substance from the aforementioned equipment.**

Jürgen Meinel is the person who has obtained and aggregated the R-12 Material. He is located at City Waste Recycling, Pine Close 1, Pokuase, Ghana. His telephone number is (b) (4), and his fax number is +233 36 2027253.

- 11. Please advise if the imported controlled substance was reclaimed by a foreign party, the name, address, contact person, phone number and fax number of any or all foreign reclamation facility(ies) responsible for reclaiming the cited shipment.**

The R-12 Material was not reclaimed. It is unused R-12 Material that was collected in 15, 30, and 50 pound cylinders and aggregated by City Waste Recycling, Pine Close 1, Pokuase, Ghana. City Waste Recycling is a private Ghanaian corporation. The contact person at City Waste Recycling is Jürgen Meinel. His telephone number is (b) (4), and his fax number is +233 36 2027253.

- 12. Please provide an export license from the appropriate government agency in the country or export and, if recovered in another country, the export license from the appropriate government agency in that country.**

Neither Tradewater nor City Waste Recycling has yet obtained an export license. Upon United States EPA approval of the import, City Waste Recycling will obtain an export license from the Ghana Environmental Protection Agency. Tradewater agrees to provide the Administrator this information prior to the actual export from Ghana of the individual shipment.

- 13. Please advise if the imported used controlled substance is intended to be sold as a refrigerant in the U.S., the name and address of the U.S. Reclaimer who will bring the material to the standard required under section 608 (S.82.152(g)) of the CAA, if not already reclaimed to those specifications.**

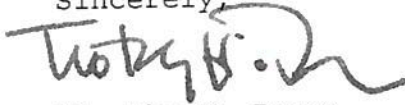
The R-12 Material is not intended to be sold as a refrigerant in the United States.

14. Please provide a certification of accuracy associated with the information submitted in the petition.

See the attached Exhibit A.

If I can answer any questions or provide any additional information about this petition, please do not hesitate to contact me at tbrown@tradewater.us or (312) 273-5122.

Sincerely,

A handwritten signature in dark ink, appearing to read "Timothy H. Brown", with a stylized flourish at the end.

Timothy H. Brown
President

Exhibit A

**Federal Operating Permit Program (40 CFR Part 71)
CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)**

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible OfficialName: (Last) Brown (First) Timothy (MI) HTitle President, Tradewater LLCStreet or P.O. Box 415 N Aberdeen StCity Chicago State IL ZIP 60642 - Telephone (312) 273 - 5122 Ext. 1000 Facsimile () - **B. Certification of Truth, Accuracy and Completeness** (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) Name (typed) Timothy H. Brown Date: 04 / 20 / 2017